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**Crystallex International Corporation v.  
Bolivarian Republic of Venezuela (1:17-mc-00151)  
(D. Del, 2017 - )**

**LETTER to the attention of Hon. Judge Stark as  
well as to the Special Master Mr. Pincus in charge  
or the Crystallex v. Venezuela case.**

**SEALED STATUS FOR THIS DOCUMENT  
RESPECTFULLY REQUESTED**

Dated: Oct, 16th, 2023

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**COURT CLERK FOR THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF DELAWARE**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**in the case of:**

<b>CRYSTALLEX INTERNATIONAL CORP,</b>  <b>Plaintiff,</b>  <b>v</b>  <b>BOLIVARIAN REPUBLIC OF</b>  <b>VENEZUELA, :</b>  <b>Defendant.</b>	          <b>Case</b>  <b>17-00151-LPS</b>
---	--

**LETTER**

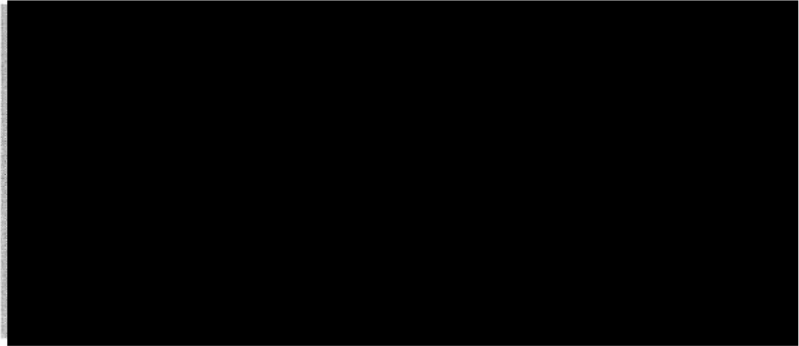
**A letter of ATTACHED JUDGMENT STATEMENT AND RELATED ISSUES currently filed in Case No: 1:23-CV-00989-MN is brought to the attention of Hon. Judge Leonard P. Stark.**

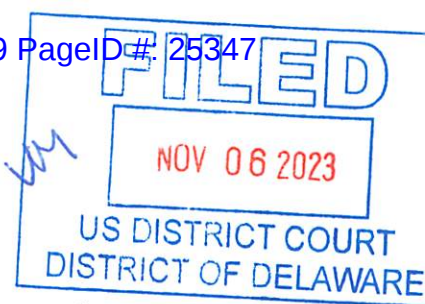
**I respectfully request this letter to be sealed for the reasons stated in case 1:23-CV-00989-MN on issues of human rights, due to the dangers for life, imprisonment in Venezuela, seizure of family or friends properties and similar injuries to the requester or his related persons and endangerment for the requester in general.**

Regarding the case Misc.No. 17-151-LPS Court's Oral Order dated August 8, 2023 (D.I. 654) adopting the Special Master's Letter Regarding Attached Judgment Statements (D.I. 652), it is brought to the attention and notice of Hon. Judge Leonard P. Stark that a letter of Attached Judgment Statement intended

for cases 17-151-LPS and 23-989-MN was filed on Oct 12th, 2023 in this court of law, and has been registered in case 23-00989-MN for the attention of the Hon. Judges presiding over each of both cases..

Respectfully submitted,





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**Crystallex International Corporation v.  
Bolivarian Republic of Venezuela (1:17-mc-00151)  
(D. Del, 2017 - )**

**LETTER to the attention of Hon. Judge Stark as  
well as to the Special Master Mr. Pincus in charge  
or the Crystallex v. Venezuela case.**

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**in the case**

CRYSTALLEX INTERNATIONAL CORP,  Plaintiff,  v  BOLIVARIAN REPUBLIC OF VENEZUELA, :  Defendant.	<b>Case No:</b>  Misc.No. 17-151-LPS
---	--

**COMMENTS ON LETTER TO REGISTER CLAIM AND RELATED  
ISSUES ADDRESSED TO THIS COURT ON OCTOBER 12, 2023**

Regarding the case Misc.No. 17-151-LPS Court's Oral Order dated August 8, 2023 (D.I. 654) adopting the Special Master's Letter Regarding Attached Judgment Statements (D.I. 652), it is respectfully brought to the Court that ,

1. Plaintiffs bring to notice of the Hon. Judge Leonard P. Stark, that a letter of ATTACHED JUDGMENT STATEMENT AND RELATED ISSUES currently filed in Case No: 1:23-CV-00989-MN is brought to the attention of Hon. Judge Leonard P. Stark.
2. Such letter of **ATTACHED JUDGMENT STATEMENT AND RELATED ISSUES** was filed in this court of law on Oct 12th, 2023, intended for cases 17-151-LPS and 23-989-MN and has been registered

in case 23-00989-MN. The court is prayed to consider it as filed for the case 17-151-LPS as well as it was intended to be filed in the 17-151-LPS case, but given the sealed characteristics of the 23-00989-MN case, the Office of the Clerk of the Court has considered it proper to have it filed in 23-00989-MN given the public access restrictions imposed in the 23-00989-MN case.

3. Plaintiffs bring to notice of the Hon. Judge Leonard P. Stark, the existence and pending results of case 1:23-CV-00989-MN\*SEALED\* for the consideration of the Hon. Judge Stark and ask for *in chambers* consideration of the issue, case to be considered hereby available to the Court and *in chambers* for parties..
4. Plaintiffs pray for this letter to be sealed as it relates to the sealed case mentioned, 1:23-CV-00989-MN\*SEALED\*.
5. Plaintiffs pray presiding Judge Stark and Special Master Pincus to register Plaintiffs in case 1:23-CV-00989-MN\*SEALED\* and all others in similar situation as preferred creditors, as it is an undisputed fact, of public knowledge, accepted by all Defendants in such case (Bolivarian Republic of Venezuela, PDVSA, PDVSA Ad-hoc, etc.) that an amount in excess of ten billion USD is indebted by Defendants to Plaintiffs and all others in similar situations in case 1:23-CV-00989-MN\*SEALED\* , namely workers and union leaders persecuted for political reasons since 2002 to this date by Defendants.

6. The condition of workers as preferential creditors is recognized both in US Law and Venezuelan Law.
7. The massive amount of the debt to the workers has been repeatedly stated by PDVSA Ad hoc president Horacio Medina, who as recently as September 2023 has publicly stated that such debt would not be payable in full even with the full liquidation of the assets of CITGO.
- 8.
9. Plaintiffs pray the court a prejudgment Writ of Attachment for the amount considered by the court of the shares of PDV Holdings, Citgo Holdings, CITGO Petroleum and other Defendants, taking into consideration the public statements and recognition made by the Defendants that the indebted amount is far in excess of ten billion USD. A number of public official statements from Defendants is documented in the mentioned case and considered known to the court.
10. Plaintiffs pray the court to grant Ex Parte Writ of Attachment and Temporary Protective Order as Plaintiffs will suffer great or irreparable injury would result if issuance of the writ of attachment was postponed until a noticed hearing, therefore an ex parte writ is prayed. There is a danger that the property sought to be attached would not be available, to levy if attachment and/or levy was delayed until after a noticed hearing. Sufficient evidence can be deemed sufficient by considering the past concealment, dishonesty and failure to meet previous obligations by the



Defendants, all well documented in this court of law. The defendant has declared to be insolvent and unable to honor its debt with workers.

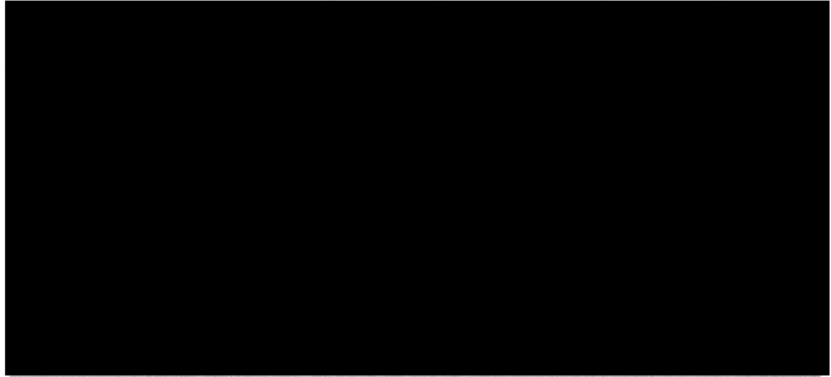
Defendants generally have failed to pay their undisputed debts for years after such debts become due.

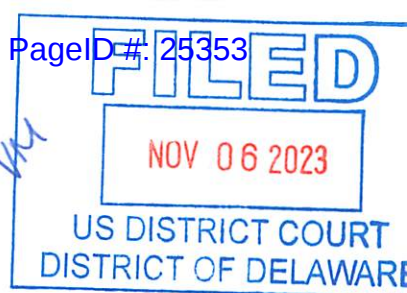
11. Plaintiffs pray, in the eventuality the Ex-parte Writ of attachment is not granted, or in order to allow for a more detailed analysis by the court, for a temporary protective order (TPO) as immediate means of relief, and so order the defendant not to dispose of or alter the property until there is a noticed hearing on the writ application and that a noticed writ of attachment be granted to Plaintiffs against Defendants.
12. Plaintiffs support these requests on the basis that it is more likely than not that the plaintiff will obtain judgment against the defendant on the sealed case mentioned in paragraph one (1).
13. The detailed declarations incorporated in the sealed case not only satisfy the statute by showing probable validity of the claim, but also show the court the justice of the plaintiff's claim. The declaration is well-supported with non-privileged documents.
14. Plaintiffs pray the court to attach all property that is subject to attachment, where a method of levy is available from Defendants as explicitly allowed by the Code of Civil Procedure: levying against real property, personal property, money, personal property in the possession of third parties, business equipment, vehicles and vessels, title documents, deposit



accounts and accounts receivable (referred to as general intangibles), and in a particular way to the assets related to CITGO Holdings, CITGO Petroleum, etc. known to the court.

Respectfully submitted,





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**Crystallex International Corporation v. Bolivarian  
Republic of Venezuela (1:17-mc-00151) (D. Del, 2017 - )**

**LETTER -Summary of Dates pursuant to which Plaintiffs  
completed certain of the Steps Leading to Participation in  
Sale. to the attention of Hon. Judge Stark as well as to the  
Special Master Mr. Pincus.**

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Dated: Oct, 16th, 2023

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**in the case**

CRYSTALLEX INTERNATIONAL CORP,  Plaintiff,  v BOLIVARIAN REPUBLIC OF VENEZUELA, :  Defendant.	<b>Case No:</b>  Misc.No. 17-151-LPS
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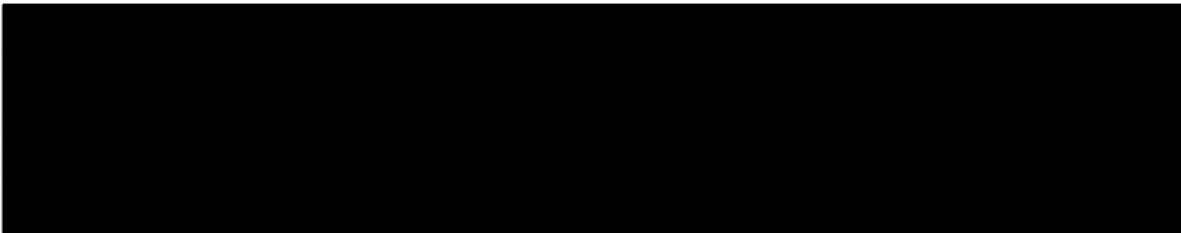
**LETTER -Summary of Dates pursuant to which Plaintiffs completed  
certain of the Steps Leading to Participation in Sale. to the attention of  
Hon. Judge Stark**

Re: Crystallex International Corporation v. Bolivarian Republic of Venezuela,

D. Del. C.A. No. 1:17-mc-00151-LPS and related case, D. Del. No.

1:23-cv-00989-MN\*SEALED\*

Dear Judge Stark:





As Plaintiff of the case 1:23-cv-00989-MN\*SEALED\* (the “PDVSA Workers Matter”) , I hereby submit, pursuant to Paragraph 3 of the Court’s Memorandum Order of October 11, 2023 (D.I. 738 of Crystallex Docket), this Summary of Dates pursuant to which Plaintiffs completed certain of the Steps Leading to Participation in Sale.

**STEP 1. A CREDITOR PROVES IT IS OWED SOME DEBT BY A VENEZUELA PARTY.** The indebtedness owed by a Venezuela party to Plaintiffs is based upon Plaintiffs’ claim of an undisputed amount of relevance by PDVSA and other subsidiaries. While the initial claim of Plaintiffs amounts to sixty five million dollars, the overall claim has been quantified by the PDVSA ad hoc board of directors as of over ten billion dollars for all those in similar situation.

**STEP 2. THE CREDITOR ENFORCES ITS AWARD IN A U.S. COURT AND RECEIVES A JUDGMENT.** On September 6th, 2023, the Plaintiffs filed claim against PDVSA and others in the US District Court for the District of Delaware as it is shown in the case 1:23-cv-00989-MN\*SEALED\* .

**STEP 3. THE CREDITOR REGISTERS ITS JUDGMENT IN THE DISTRICT OF DELAWARE.** On October 12th, 2023, Plaintiffs registered the PDVSA Workers Claim in the District of Delaware in memorandum letter **“ATTACHED JUDGMENT STATEMENT AND RELATED ISSUES”** filed in this court of law on Oct 12th, 2023, addressed for cases 17-151-LPS and 23-989-MN and registered in case 23-00989-MN

**STEP 4. THE CREDITOR MOVES IN DELAWARE FOR A WRIT OF ATTACHMENT FIERI FACIAS.** On said October 12th, 2023 writing, Plaintiffs prayed the court a prejudgment Writ of Attachment for the amount considered by the court of the shares of PDV Holdings, Citgo Holdings, CITGO Petroleum and other Defendants, taking into consideration the public statements and recognition made by the Defendants that the indebted amount is far in excess of ten billion USD. A number of public official statements from Defendants is documented in the mentioned case and considered known to the court. Plaintiffs prayed to the court as well to grant Ex Parte Writ of Attachment and Temporary Protective Order as Plaintiffs will suffer great or irreparable injury would result if issuance of the writ of attachment was postponed until a noticed hearing, therefore an ex parte writ is prayed. Sufficient evidence can be deemed sufficient by considering the past concealment, dishonesty and failure to meet previous obligations by the Defendants, all well documented in this court of law. The defendant has declared to be insolvent and

unable to honor its debt with workers. Defendants generally have failed to pay their undisputed debts for years after such debts become due. Plaintiffs prayed, in the eventuality the Ex-parte Writ of attachment was not granted, or in order to allow for a more detailed analysis by the court, for a temporary protective order (TPO) as immediate means of relief, and so order the defendant not to dispose of or alter the property until there is a noticed hearing on the writ application and that a noticed writ of attachment be granted to Plaintiffs against Defendants.

**STEP 5. THE CREDITOR OBTAINS A WRIT OF ATTACHMENT FL. FA., WHICH MAY BE CONDITIONED ON SUBSEQUENT EVENTS.**

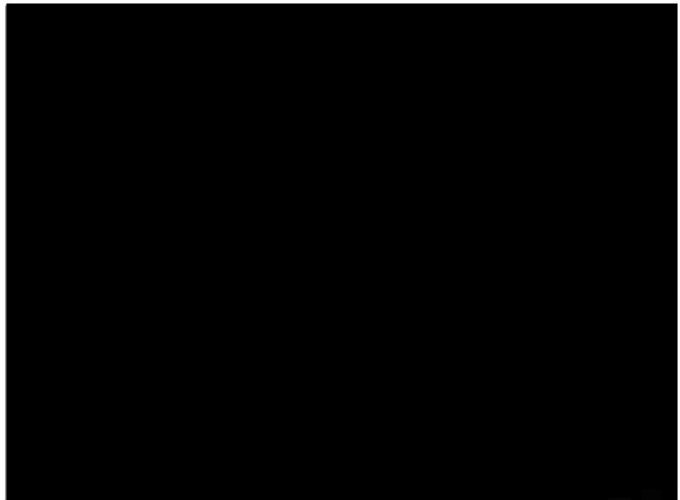
Pending. Plaintiffs are in the process of completing Step 5 and await the Court's decision on Plaintiff's Motion. The current deadline to complete Step 5 (Writ) is January 12, 2024 per the Court's October 11, 2023 Memorandum Order (D.I. 738 of Crystallex Docket).

**STEP 6. THE CLERK ISSUES TO THE UNITED STATES MARSHALS SERVICE ("MARSHALS") THE WRIT OF ATTACHMENT FL. FA.** To be completed. Plaintiffs will undertake efforts related to Step 6 following satisfaction and completion of Step 5.

**STEP 7. THE U.S. MARSHALS SERVICE SERVES THE CREDITOR'S WRIT OF ATTACHMENT, PERFECTING THE WRIT AND**

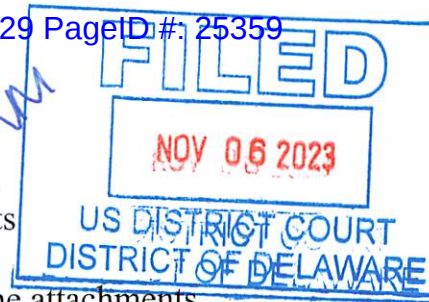
**ATTACHING THE SHARES OF PDVH OWNED BY PDVSA.** To be completed. Plaintiffs will undertake efforts related to Step 7 following satisfaction and completion of Step 6. The deadline to complete Step 7 (Perfected Writ) is April 11, 2024 per the Court's October 11, 2023 Memorandum Order (D.I. 738 of Crystallex Docket).

Plaintiffs are available at the convenience of the Court or the Special Master should there be any questions or concerns regarding the foregoing.





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**Crystallex International Corporation v.  
Bolivarian Republic of Venezuela (1:17-mc-00151)  
(D. Del, 2017 - )**

**Respectful request of Electronic filing privilege to  
the attention of Hon. Judge Stark.**

**SEALED STATUS FOR THIS DOCUMENT  
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Dated: Oct, 16th, 2023

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**in the case**

<b>CRYSTALLEX INTERNATIONAL CORP,</b>  <b>Plaintiff,</b>  <b>v</b>  <b>BOLIVARIAN REPUBLIC OF</b>  <b>VENEZUELA, :</b>  <b>Defendant.</b>	<b>Case No:</b>  <b>Misc.No. 17-151-LPS</b>
---	---

**RESPECTFUL REQUEST LETTER FOR PERMISSION FOR  
ELECTRONIC CASE FILING 17-151-LPS**

**I respectfully request this letter to be sealed for the reasons stated in case 1:23-CV-00989-MN on issues of human rights, due to the dangers for life, imprisonment in Venezuela, seizure of family or friends properties and similar injuries to the requester or his related persons and endangerment for the requester in general.**

I respectfully ask the Court for permission to participate in electronic case filing (“e-filing”) in this case.

My filing interest and standing derives from case 1:23-CV-00989-MN that closely relates to Misc.No. 17-151-LPS, both known to this court.

I am to file *Pro se*.

I affirm under penalty of perjury that:

I have independently reviewed all the Court's Electronic Case Filing Rules & Instructions, all the available documentation, videos, text and similars at **<https://www.ded.uscourts.gov/registrationtraining>**, including and not limited to the following sub pages, directories and referenced pages:

- Registration/Training
- Tutorials
- Manuals/Procedures
- Sealed Document Filing Video
- Case Opening Video
- CM/ECF Technical FAQs

and agree to abide by them.

I have independently reviewed all of the materials and related topics on the Court's website, and have a PACER account in good standing, identified as follows:

<b>Account Number</b>	<b>***1280</b>
<b>Username</b>	<b>****tino</b>
<b>Account Balance</b>	<b>\$0.00</b>
<b>Case Search Status</b>	<b>Active</b>
<b>Account Type</b>	<b>Upgraded PACER Account</b>

I understand that once I register for e-filing, I will receive notices and documents only by e-mail in this case and not by regular mail.

I understand that if I am granted permission to participate in e-filing, I must file my documents electronically and I may not submit documents to the Pro Se Intake Unit for scanning and docketing.

I know how to convert a document to PDF-A format.

I have regular access to the technical requirements necessary to e-file successfully:

I have regular access to a computer with internet access and a word processor.

Type of computer I will be using: HP Z400; type of word processor I will be using: Google Docs.

I have regular access to an e-mail account that I am to review (on a daily basis) to receive notifications from the Court and notices from the e-filing system.

I have regular access to a scanner to convert documents that are only in paper format into electronic files scanning equipment I will be using.

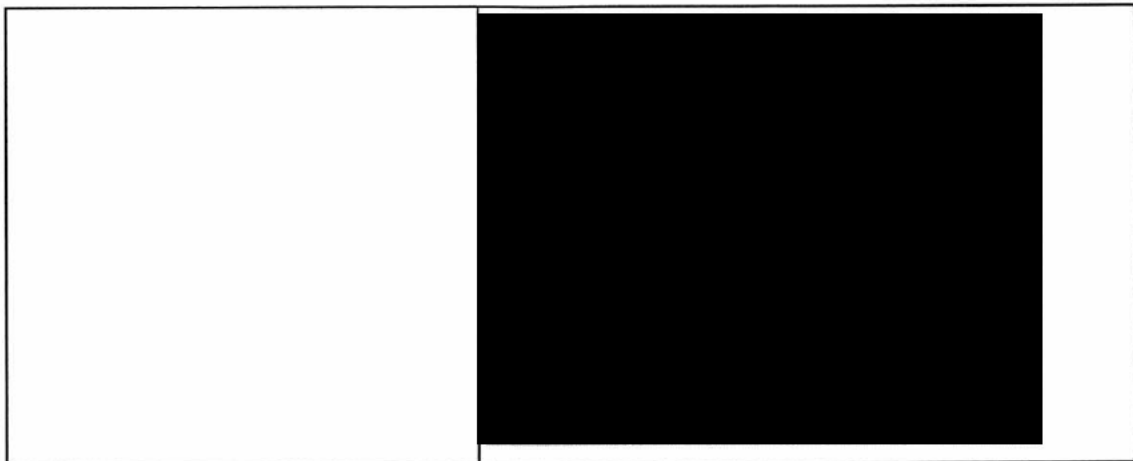
I have regular access to a PDF reader and a PDF writer to convert word-processing documents into PDF format, the only electronic format in which documents can be e-filed.

I have regular access to a printer or copier to create required paper copies such as chambers copies.

I understand that I must regularly review the docket sheet of the case so that I do not miss a filing.

I understand that if my use of the ECF system is unsatisfactory, my e-filing privileges may be revoked, and I will be required to file documents in paper.

Respectfully submitted,



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**Crystallex International  
Corporation v. Bolivarian  
Republic of Venezuela  
(1:17-mc-00151) (D. Del, 2017 - )**



**Response to Court Order from  
the Plaintiffs in Case 23-CV-00989-MN.**

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Dated: Oct, 31st, 2023

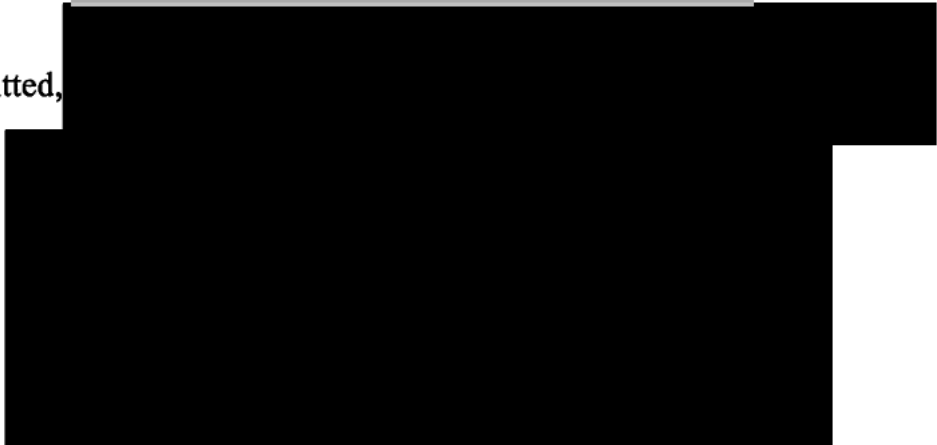
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in the Crystallex case by the undersigned and by any of the Plaintiffs in Case  
23-CV-00989-MN.

Respectfully submitted,

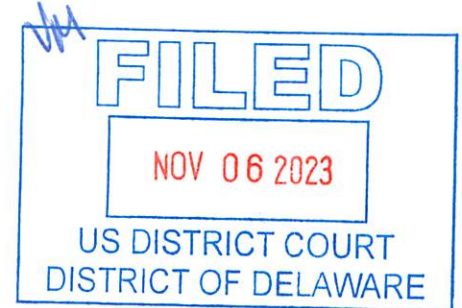




**Memorandum detailing how, under applicable law, the Court may approve  
the continued sealing of the documents submitted in this case**

ARGUMENTS IN SUPPORT OF MOTION TO SEAL IDENTITY OF  
PLAINTIFFS AND CONTENT

I. LEGAL FRAMEWORK



The right to open court proceedings is a fundamental principle of the U.S. judicial system and is protected under the First Amendment to the United States Constitution. However, this right is not absolute and may be subject to limitations when the privacy and safety of the parties involved are at risk. Courts have recognized that the sealing of records or identities may be warranted in certain circumstances to protect the interests of the parties involved. Nevertheless the United States Constitution recognizes a fundamental right to privacy. Courts have consistently acknowledged that individuals have a compelling interest in safeguarding their personal information and safety when there is a credible threat to their well-being.

II. REASONS FOR SEALING IDENTITY AND CONTENT

1. **Protection of Privacy and Safety:** The Plaintiffs in this case face a significant danger or peril that warrants the sealing of their identity and content of the suit. In this case the disclosure of the Plaintiffs' identity and the details of the suit could expose them to harm, harassment, or retaliation by the Defendants or third parties. In the case of Plaintiffs in Case 23-CV-00989-MN against CITGO and PDVSA, all persons involved in legal actions against assets that the government ruling the territory of Venezuela considers as of its property or interest have been classified as terrorists and traitors by such government ruling the territory of Venezuela. Exposing the identities of Plaintiffs in Case 23-CV-00989-MN exposes them and their families to immediate retaliation. Plaintiffs in Case 23-CV-00989-MN, as private persons are endangered should their identity be known to the government ruling the territory of Venezuela.

2. **Precedents:** Courts have recognized that the privacy and safety of the parties involved may outweigh the public interest in open proceedings. In cases where there is a risk of danger or peril, courts have granted motions to seal identities and records to protect the parties involved.

**Federal Rule of Civil Procedure 5.2:** Rule 5.2 provides for the redaction of sensitive personal information from documents filed with the court, including a party's social security number, financial account number, birthdate, and the last four digits of any identifying number. While the Rule does not specifically

address the sealing of identities or content, it underscores the principle of protecting personal information.

Federal Rule of Civil Procedure 26(c): Rule 26(c) empowers the court to issue protective orders to safeguard a party from annoyance, embarrassment, oppression, or undue burden or expense. The risk of danger or peril faced by plaintiffs can constitute "undue burden" under this Rule. In this case there is an evident danger to life and unlawful imprisonment to innocent individuals.

Common Law Doctrine: Courts have a long-standing tradition of exercising their inherent authority to protect parties from harm, harassment, or retaliation by sealing their identities and case details when substantial danger or peril is demonstrated.

### III. The Plaintiffs' Specific Circumstances

In this case, the plaintiffs have provided compelling evidence of credible threats to their personal safety and well-being should their identities and the content of their claims become public.

All Plaintiffs are private individuals who have been either imprisoned, exiled, have their property seized or been subject to legal proceedings without ground.

Additionally the claims and issues presented by Plaintiffs place them as potential witnesses with reasonable grounds to fear retaliation or harassment from adverse parties if their identities are disclosed.

**Criminal Elements:** The nature of the claims of Plaintiffs in this case arises from criminal activities by defendants, and plaintiffs fear retribution by those with criminal intent.

3. **Compelling Interest:** In this case, the Plaintiffs have a compelling interest in protecting their safety and privacy. The danger or peril faced by the Plaintiffs is substantial and credible, and the risk of harm or retaliation is real.

#### IV. Balancing of Interests

The court must balance the plaintiffs' interest in protecting their safety and well-being against any countervailing interest in maintaining public access to court proceedings. Given the compelling evidence of danger or peril faced by the plaintiffs and the absence of any countervailing interest, sealing their identities and the content of their claims is both just and necessary.

4. **Narrowly Tailored:** The motion to seal the identity and content of the Plaintiffs is narrowly tailored to address the specific danger or peril faced by the Plaintiffs. The sealing of records is limited to the identity and content of the Plaintiffs, and other aspects of the proceedings will remain open to the public.

## V. CONCLUSION

In light of the danger or peril faced by the Plaintiffs, the sealing of their identity and content of the suit is necessary to protect their safety and privacy. The motion is supported by legal principles, precedents, and a compelling interest in protecting the Plaintiffs from harm or retaliation. The motion is also narrowly tailored to address the specific danger or peril faced by the Plaintiffs. For these reasons, the Plaintiffs respectfully request that the Court grant the motion to seal the identity and content of the Plaintiffs in this civil suit.

Based on the constitutional right to privacy, Federal Rules of Civil Procedure, the common law doctrine of protecting parties from danger or peril, and the specific circumstances of this case, the Plaintiffs respectfully submit that the sealing of the identity and content of Plaintiffs in this civil suit is justified by the credible threat of danger or peril faced by the Plaintiffs. The proposed sealing is necessary to protect the Plaintiffs' safety and well-being and is narrowly tailored to serve the compelling interest in this case. The Plaintiffs therefore requests that the Court grant the motion to seal the identity and content of Plaintiffs in this civil suit.

Respectfully submitted,



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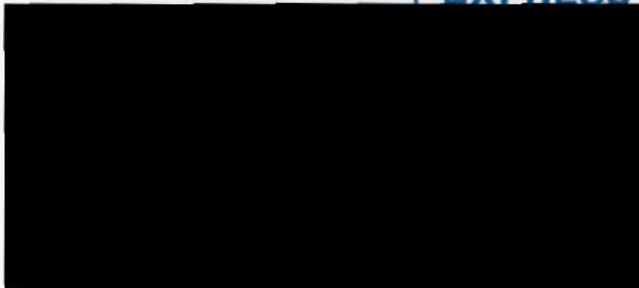
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PO ZIP Code 33178	Scheduled Delivery Date (MM/DD/YY) 11/06/23	Postage \$ 28.95	
Date Accepted (MM/DD/YY) 11/04/23	Scheduled Delivery Time <input type="checkbox"/> 6:00 PM	Insurance Fee \$	COD Fee \$
Time Accepted 1:16	<input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	Return Receipt Fee \$	Live Animal Transportation Fee \$
Special Handling/Fragile \$	Sunday/Holiday Premium Fee \$	Total Postage & Fees \$ 28.95	
Weight 7 lbs.	<input type="checkbox"/> Flat Rate	Acceptance Employee Initials N.C.	

## DELIVERY (POSTAL SERVICE USE ONLY)

Delivery Attempt (MM/DD/YY)	Time	<input type="checkbox"/> AM <input type="checkbox"/> PM	Employee Signature
Delivery Attempt (MM/DD/YY)	Time	<input type="checkbox"/> AM <input type="checkbox"/> PM	Employee Signature

LABEL 11-B, MAY 2021

PSN 7690-02-000-9996

UNITED STATES  
POSTAL SERVICE®



# PRIORITY ★ MAIL ★ EXPRESS™



CASE 1:17-CY-00151-LPS-SEALED CONTENT

## FLAT RATE ENVELOPE

ONE RATE ★ ANY WEIGHT\*



PS 10001000059

EP13L July 2013  
OD: 15 x 9.5



\* Money Back Guarantee to U.S., select APO/FPO/DPO, and select International destinations. See DMM and IMM at [pe.usps.com](https://pe.usps.com) for complete details.

\* For International shipments, the maximum weight is 4 lbs.